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12 Attorneys for Plaintiff
13 VERIGY US, INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 VERIGY US, INC, a Delaware Corporation

18 Plaintiff,

19 vs.

20 ROMI OMAR MAYDER, an individual;
21 WESLEY MAYDER, an individual; SILICON
22 TEST SYSTEMS, INC., a California Corporation;
23 and SILICON TEST SOLUTIONS, LLC, a
24 California Limited Liability Corporation,
25 inclusive,

26 Defendants.

Case No. C07 04330 RMW (HRL)

**PLAINTIFF'S ADMINISTRATIVE
MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Judge: Honorable Ronald M. Whyte
Ctrm: 6

1 Pursuant to Civil Local Rules 7-11(a) and 79-5(b), Plaintiff Verigy U.S., Inc. ("Plaintiff"
2 or "Verigy") requests that the following materials be filed under seal, as they contain confidential
3 information that is protected by the Stipulated Protective Order entered by the Court on August
4 29, 2007. The documents submitted under seal include: Exhibits 1 and 2 of the Declaration of
5 Michael W. Stebbins in Support of the Application for an Order to Show Cause Re: Contempt
6 Against Defendants Romi Mayder and Silicon Test Systems, Inc.

7 These materials (hereafter "the Materials") disclose information that has been designated
8 as "Confidential" by the parties under the Protective Order, without objection to those
9 designations (although Verigy reserves its rights to challenge such designations pursuant to the
10 Stipulated Protective Order). Although the information in the Materials has been designated as
11 protected from disclosure under the Protective Order, Verigy must rely on this information in
12 support of its Application. The parties' confidentiality interest therefore overcomes the right of
13 public access to the record, as a substantial probability exists that the parties' overriding
14 confidentiality interest will be prejudiced if the record is not sealed. Further, the proposed sealing
15 is narrowly tailored and no less restrictive means exist to achieve this overriding interest

16 Pursuant to Local Civil Rule 79-5(b)-(c), Verigy therefore lodges the Materials with this
17 Court, and respectfully requests leave to file the aforementioned documents under seal.

18 Respectfully submitted.

19 Dated: March 7, 2008

BERGESON, LLP

20 By: /s/
21 Melinda M. Morton
22 Attorneys for Plaintiff
23 VERIGY US, INC.
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